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Attorneys for Defendants
UNITED HEALTH-CARE INSURANCE COMPANY
and UNITED BEHAVIORAL HEALTH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAVID AND NATASHA WIT, on behalf
of themselves and all others similarly
situated, and BRIAN MUIR, on his own
behalf and on behalf of all others similarly
situated,

Plaintiffs,

v.

UNITEDHEALTHCARE INSURANCE
COMPANY and UNITED BEHAVIORAL
HEALTH (operating as OPTUMHEALTH
BEHAVIORAL SOLUTIONS),

Defendants.

Case No. 3:14-CV-02346-JCS

**STIPULATION CONCERNING
DEFENDANTS UNITED HEALTHCARE
INSURANCE COMPANY AND UNITED
BEHAVIORAL HEALTH'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF AND EXHIBITS TO THE
DECLARATIONS OF JENNIFER D.
THOMPSON KINBERGER AND JANE E.
STALINSKI**

1 WHEREAS, Defendants United Healthcare Insurance Company (“UHIC”) and United
 2 Behavioral Health (“UBH”) (collectively, “Defendants”) will file on July 18, 2014 an
 3 Administrative Motion to Seal Portions of and Exhibits to the Declarations of Jennifer D.
 4 Thompson Kinberger and Jane E. Stalinski;

5 WHEREAS, subject to Plaintiffs’ preservation of the right to later challenge before this
 6 Court the confidential nature of the documents, Plaintiffs agree to treat Exhibits 1 and 3 to the
 7 Declaration of Jane E. Stalinski as confidential, not disclose them publicly or use them for any
 8 purpose other than this litigation, and agree that the exhibits will be treated as confidential under
 9 any protective order that is entered in this case; and

10 WHEREAS, Plaintiffs do not oppose Defendants’ Administrative Motion;

11 Plaintiffs and Defendants, by their undersigned attorneys, hereby stipulate, subject to the
 12 approval of the Court, that Defendants are permitted to file under seal the following:

- 13 • Portions of the Declaration of Jennifer D. Thompson Kinberger in Support of
- 14 Defendants United Healthcare Insurance Company and United Behavioral
- 15 Health’s Motion to Transfer Venue under 28 U.S.C. § 1404(a) (“Kinberger
- 16 Declaration”), as identified with highlighting in the versions submitted to the
- 17 Court;
- 18 • Exhibits 1-3 to the Kinberger Declaration in their entirety;
- 19 • Portions of the Declaration of Jane E. Stalinski in Support of Defendants United
- 20 Healthcare Insurance Company and United Behavioral Health’s Motions to
- 21 Transfer Venue under 28 U.S.C. § 1404(a), to Dismiss, and to Seal (“Stalinski
- 22 Declaration”), as identified with highlighting in the versions submitted to the
- 23 Court; and
- 24 • Exhibits 1, 3, 5 and 6 of the Stalinski Declaration in their entirety.

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1 Dated: July 18, 2014

CROWELL & MORING LLP

2 /s/ Nathaniel P. Bualat

3 Christopher Flynn

4 Jennifer D. Romano

Nathaniel P. Bualat

Attorneys for Defendants

5 UNITED HEALTH-CARE INSURANCE COMPANY
6 and UNITED BEHAVIORAL HEALTH
7

8 Dated: July 18, 2014

ZUCKERMAN SPAEDER LLP

9 /s/ D. Brian Hufford

10 D. Brian Hufford

11 Jason S. Cowart

Attorneys for Plaintiffs

12 DAVID AND NATASHA WIT and BRIAN MUIR
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14 **FILER'S ATTESTATION**

15 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the
16 filing of this document has been obtained from the other signatories.

17 Dated: July 18, 2014

18 /s/ Nathaniel P. Bualat

Nathaniel P. Bualat

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